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December 1, 2005

VIA HAND DELIVERY

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, Second Floor
Boston, Massachusetts 02110

**RE: Western Massachusetts Electric Company Semi-Annual Double Pole Report,
D.T.E. 03-87**

Dear Secretary Cottrell:

WMECO hereby submits its Semi-Annual Double Pole Report. This report covers the six month time period from April 1, 2005, until November 1, 2005. Enclosed for filing are the original and nine copies of this status report.

In its November 28, 2003 report relative to a plan to eliminate the backlog of double utility poles within the Commonwealth, pursuant to Chapter 46 of the Acts of 2003, Section 110 ("Report"), the Department of Telecommunications and Energy ("Department") required pole owners to submit detailed plans for eliminating the backlog of double poles as soon as reasonably practicable. Western Massachusetts Electric Company ("WMECO"), as a pole owner, filed its plan for eliminating the backlog of double poles on January 27, 2004, and has filed Semi-Annual Double Pole Reports on October 28, 2004 and April 1, 2005. WMECO also provided yearly double pole progress and strategy for pole management in its 2005 Annual Reliability Filing, which was filed with the Department on December 30, 2004.

On June 16, 2005, Hearing Officer William Stevens issued a Hearing Officer Ruling on Standardized Filing Format for Semi-Annual Double Pole Reports (the "Procedural Order"), requiring the pole owners to file semi-annual double pole reports using a standardized format, and specifying that the first standardized report be submitted by June 30, 2005.

On July 19, 2005, WMECO along with the other pole owners in Massachusetts attended a technical conference requested by the pole owners to discuss compliance with the Department's directives in the Procedural Order. In particular, the discussion involved the Double Pole Grid, included in the Department's Procedural Order, which required information not available in the Pole Lifecycle management ("PLM") database designed by InQuest Technologies utilized by the pole owners to manage double pole transfer and removal activity. The pole owners requested additional time to work with InQuest Technologies to determine how the PLM system could be modified to provide the reporting information requested in the Double Pole Status Grid.

On July 20, 2005 Hearing Officer Stevens issued a procedural memorandum requiring that by August 2, 2005, the pole owners either submit a new semi-annual double pole report or provide a status of their efforts to propose a new standardized double pole reporting format.

On August 2, 2005, the Companies provided their status report regarding their progress in working with InQuest Technologies to develop a revised double pole reporting format, which would provide the specific data regarding the removal of backlog double poles, those set before January 31, 2004, and new double poles, which were defined as any poles set after January 31, 2004.

On August 10, 2005, the pole owners filed a Joint Motion to Modify the Department's Procedural Order. The Department staff conferred with the pole owners on August 29, 2005, and as a result an amended Joint Motion to Modify the Department's Procedural Order was filed on August 31, 2005. On September 1, 2005, Hearing Officer Stevens approved the Amended Joint Motion.

Since July 19, 2005, WMECO has worked collaboratively with the other Massachusetts pole owners and InQuest Technologies to prepare technical specifications and requirements for modification of the PLM System to meet the reporting requirement of supplying the double pole data in the format agreed to on September 1st. Extensive testing and data verification was performed by the pole owners and InQuest Technologies to insure the reporting functionality was working properly and that the data was accurate in the newly designed reports. The PLM modifications went live in the PLM System on the weekend of October 29th.

It was agreed by the pole owners and the Department that the Semi-Annual Double Pole Status Grid, representing data for all the double poles in Massachusetts for the reporting period, would be submitted jointly by the pole owners in one report and would be provided to the Department in both electronic and paper formats. Providing the data in one report ensures consistency of the data which each pole owner will be reporting on separately in its own narrative report. The Status Grid Report provides five separate Excel spreadsheets with the following titles: Double Poles Backlog Summary; Double Poles Backlog Poles; Double Poles New Poles Summary; Double Poles New Poles; and Double Pole Summary Statistics. Verizon Massachusetts will be compiling and submitting the data to the Department on behalf of the other pole owners.

In the period since its last Semi-annual report, WMECO has continued to place strong emphasis on the removal of double poles in the cities and towns that it serves. An element of this is the effort concentrated on ensuring the accuracy of the information in the PLM System. WMECO continues to meet with Verizon Massachusetts on a monthly basis to discuss work-related issues, including double poles. WMECO has not had any significant issues involving laggard licensees. Discussions have been held with licensees regarding transfer of their facilities, and the licensees have been cooperative. WMECO plans to concentrate on its double pole removals, with the goal of first eliminating the backlog of poles that are ready to remove.

In recent months WMECO has hired a contractor capable of removing large numbers of double poles while WMECO continued to perform customer work and reliability improvements on its electrical distribution system. This has been particularly effective in areas where there was a concentration of double poles, ready to remove, within a particular town. WMECO intends to continue this practice as a way of being able to remove double poles once all transfers have been completed.

WMECO believes the management of double poles by concentrating on the completion of its own transfers and removing all poles that are in a ready to remove status will be the most effective means of reducing the number of double poles within its service territory. WMECO finds it cannot provide an express deadline for the removal of all backlog double poles because it does not have control of the transfers that must be accomplished before the poles it has responsibility for can be removed, nor does it have knowledge of when these necessary transfers will be completed. WMECO will aggressively remove double poles once all required transfers have been completed.

The present status of double pole transfers and remediation in WMECO's service territory is shown in the table below:

WMECO Double Pole Status as of November 1, 2005

WMECO to Shift	Others to Shift	Verizon MA to Shift	Ready to Remove Verizon	Ready to Remove-WMECO	Total Double Poles
183	96	831	29	87	1226

WMECO has analyzed the state-wide Double Pole Status Grid and extracted the information for the double poles located within the cities and towns that it serves. A summary of the extracted information is provided in the tables below:

WMECO Double Pole Backlog

Summary:

	Backlog Total Poles	Backlog Remaining Poles	Backlog Removed Poles	Backlog % Poles Removed
Totals:	1148	367	781	68.03%

WMECO Double Pole New Pole Summary:

	New Poles at Start	New Poles Added	New Poles Removed	Remaining New Poles > 90 Days	New Poles Remaining at End
Totals:	810	332	283	762	859

**WMECO Double Pole Summary
Statistics:**

	Backlog Remaining Poles	New Poles Remaining at End	Total Poles Remaining
Totals:	367	859	1226

In conclusion, the PLM System is proving to be an effective tool in managing and facilitating double pole removal. WMECO is committed to work toward the elimination of the double pole backlog in the municipalities that it serves. Please contact me or John Tulloch ((413) 787-9018, or email: tullojs@nu.com) should you have any questions in regard to this filing.

Very truly yours,

Donald M. Bishop
Manager, Regulatory Policy - Massachusetts